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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
REYES QUINONEZ,  
  
Defendant.

CASE NO. 1:23-CR-00054-JLT-SKO  
  
STIPULATION AND ORDER REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT;  
  
DATE: March 6, 2024  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

This case is set for status conference on March 6, 2024. By this stipulation, defendant now moves to continue the status conference until May 15, 2024, and to exclude time between March 6, 2024, and May 15, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv).

a) The government represents that discovery in this matter, including officer worn body camera, police reports, and other items have been produced to defense.

b) Defense counsel needs the additional time to produce supplemental discovery to the government, including investigators reports. These reports are necessary for the government to review in evaluating a potential offer in the case.

c) Defense counsel also requests the additional time to review the discovery, meet with his client, conduct independent investigation, and pursue a pretrial resolution of the case.

The government and defense counsel have been in communication about a pretrial resolution of the case and need the additional time to continue those discussions.

d) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of March 6, 2024 to May 15, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

2. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 26, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ JUSTIN J. GILIO  
JUSTIN J. GILIO  
Assistant United States Attorney

Dated: February 26, 2024

/s/ REED GRANTHAM  
REED GRANTHAM  
Counsel for Defendant  
Reyes Quinonez

**ORDER**

IT IS SO ORDERED.

DATED: 2/28/24

  
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THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE